

Remarks

This Application has been carefully reviewed in light of the Office Action mailed April 21, 2006. Applicants believe all claims are allowable without amendment and respectfully provide the following remarks. Applicants respectfully request reconsideration and allowance of all claims.

I. Claims 1-26 are Allowable over the Proposed *Bell-Abjanic* Combination.

The Examiner rejects claims 1-26 under 35 U.S.C. § 103(a) as being unpatentable over U.S. 2006/0031147 by Bell et al. (“*Bell*”) in view of U.S. 2004/0205597 by Abjanic (“*Abjanic*”). Applicants respectfully disagree.

1. Even if *Bell* and *Abjanic* could be considered analogous art and properly combined, the proposed combination would still fail to disclose, teach, or suggest various limitations recited in Applicants’ claims.

Applicants discuss independent Claim 1 as an example. Independent claims 8, 15, and 22-26 recite certain similar limitations.

a. *Bell* fails to disclose, teach, or suggest various limitations recited in Applicants’ claims.

At a minimum, *Bell* fails to disclose, teach, or suggest the end-user ordering module of Claim 1 that is operable to:

- determine whether an end-user requested service item contained in a service provider product catalog relates to a service item type having at least one associated developer defined label (DDL), the DDL extending the attributes of the associated service item type by specifying an additional attribute for which a value may be collected from the end-user and supplied in connection with creation of an end-user order for the requested service item, the value not needed to complete the end-user order but collected and supplied to avoid needing to collect the value from the end-user in connection with subsequent creation of an inter-provider order that corresponds to the end-user order;
- if the requested service item relates to a service item type having at least one DDL, prompt a user of the end-

user ordering module to collect from the end-user and supply a value for the additional DDL-specified attribute in connection with creation of the end-user order for the requested service item; and

- communicate the end-user order for use in subsequently creating the corresponding inter-provider order

Bell fails even to disclose, teach, or suggest a “developer defined label (DDL)” as recited in Claim 1. The Examiner states that “DDL as defined in page 10, lines 3-4 of the specification for collecting and processing information associated with the creation of Product Service Requests. Thus, *Bell* discloses DDL as company-user to develop sets of performance-defining rule in paragraph 0045, 0040-0044, and 0049.” (Office Action, p. 3.) However, the section of Applicants’ specification to which the Examiner refers as defining DDLs actually refers to developer defined rules (DDRs), not DDLs. The specification states, “Thus, in one embodiment, the item types 56 specify developer defined rules (DDRs) for collecting and processing information associated with the creation of PSRs 40.” (Specification p. 10, lns. 3-4.) DDLs are different from DDRs, Claim 1 recites DDLs not DDRs, and *Bell* paragraphs 0045, 0040-0044, and 0049 do not disclose DDLs whether or not they disclose DDRs.

For example, *Bell* fails to disclose, teach, or suggest, as recited in Claim 1, the DDL “extending the attributes of the associated service item type by specifying an additional attribute for which a value may be collected from the end-user and supplied in connection with creation of an end-user order for the requested service item.” *Bell* fails to disclose, teach, or suggest that the “Rule Engine” described in paragraphs 0045-0049 generates a “Rule” providing such functionality. The Examiner has not cited any other portion of *Bell* as allegedly disclosing such functionality.

As another example, the cited portions of *Bell* fail to disclose, teach, or suggest that the DDL extends the attributes of the associated service item type where the value is “*not* needed to complete the end-user order but collected and supplied to avoid needing to collect the value from the end-user in connection with subsequent creation of an inter-provider order that corresponds to the end-user order.” Thus, Claim 1 recites the ability to extend the attributes of the associated service item type and collect the value from the end-user at the time of creation of the end-user order to avoid collecting the value from the end-user during creation of an inter-provider order. The Examiner cites *Bell* paragraphs 0028-0033 and 0040-

0049 (Office Action, p. 3), but those portions of *Bell* (and all other portions of *Bell*) fail to disclose, teach, or suggest any such ability.

Furthermore, *Bell* fails to disclose, teach, or suggest the inter-provider ordering module of Claim 1 that is operable to:

- receive the end-user order;
- determine whether the end-user order has a value for the additional DDL-specified attribute; and
- if the end-user order has a value for the additional DDL-specified attribute, automatically map the value from the end-user order to an appropriate field of the inter-provider order such that the value need not be collected from the end-user in connection with creation of the inter-provider order.

Applicants respectfully submit that the Examiner has not identified where *Bell* allegedly discloses, teaches, or suggests an inter-provider ordering module operable to “determine whether the end-user order has a value for the additional DDL-specified attribute.” The Examiner cites *Bell* paragraph 0033. (Office Action, p. 4.) However, in what appears to be the most pertinent section of the cited portions of *Bell*, *Bell* merely discloses that “The validator verifies the attributes of the context object against a grammar repository in the DIT before further operation.” (*Bell* ¶ 0033.) This does not meet the limitation of determining whether the end-user order has a value for the additional DDL-specified attribute as recited in Claim 1.

Moreover, *Bell* fails to disclose, teach, or suggest an inter-provider ordering module operable to “automatically map the value from the end-user order to an appropriate field of the inter-provider order such that the value need not be collected from the end-user in connection with creation of the inter-provider order.” The Examiner acknowledges that “Bell does not explicitly teach automatically map the value.” (Office Action, p. 4.) However, the Examiner argues that *Abjanic* makes up for this deficiency of *Bell*. Applicants respectfully disagree.

b. *Abjanic* fails to make up for deficiencies of *Bell*.

The proposed *Bell-Abjanic* combination fails to disclose, teach, or suggest “automatically map[ping] the value from the end-user order to an appropriate field of the inter-provider order such that the value need not be collected from the end-user in connection

with creation of the inter-provider order.” *Abjanic* discloses that “application program 112 may be a business program or a program for managing inventory, orders or other business transactions. For example, application program 112 may automatically and electronically detect that inventory has decreased below a threshold value and then automatically generate and send a purchase order to a supplier’s server.” (*Abjanic* ¶ 0024.) The Examiner states, “Thus, it would have been obvious to one of ordinary skill in the art to automatically map the value to an intended receiving party over a network via electronic communication as discloses in *Abjanic*.” (Office Action, p. 4.) It appears that the Examiner improperly equates mapping a value with generating and sending a purchase order. Applicants respectfully submit that the Examiner has not provided any support for this assertion and has not provided any other evidence that *Abjanic* discloses, teaches, or suggests “automatically map[ping] the value from the end-user order to an appropriate field of the inter-provider order such that the value need not be collected from the end-user in connection with creation of the inter-provider order” as specifically recited in Claim 1. The proposed combination of *Abjanic* with *Bell* also does not make up for any of the other above-stated deficiencies of *Bell*.

2. Conclusion with respect to the obviousness rejections.

For at least these reasons, Applicants respectfully submit that the proposed *Bell-Abjanic* combination fails to support the obviousness rejection of independent Claim 1. Thus, Applicants respectfully request reconsideration and allowance of independent Claim 1 and its dependent claims. For at least analogous reasons, Applicants also respectfully request reconsideration and allowance of independent Claims 8, 15, and 22-26 and their dependent claims.

II. No Waiver

All of Applicants’ arguments are without prejudice or disclaimer. Applicants do not waive other arguments not presented in this response. For example, Applicants reserve the right to argue that *Bell* and *Abjanic* are non-analogous art and that the proposed *Bell-Abjanic* combination is improper because there is no teaching, suggestion, or motivation in the prior art for the combination and because the combination would be inoperative. Additionally, by not responding to additional statements made by the Examiner, Applicants do not acquiesce to the Examiner’s additional statements.

Conclusion

For at least the foregoing reasons, Applicants respectfully request reconsideration and full allowance of all pending claims.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants at the Examiner's convenience at (214) 953-6812.

Applicants believe that no fees are due. However, the Commissioner is hereby authorized to charge any fees or credit any overpayment to Deposit Account No. 02-0384 of Baker Botts L.L.P.

Respectfully submitted,

BAKER BOTT S L.L.P.
Attorneys for Applicants



Christopher W. Kennerly
Reg. No. 40,675

Dated: 7/20/06

Correspondence Address:

Baker Botts L.L.P.
2001 Ross Avenue, 6th Floor
Dallas, Texas 75201-2980
(214) 953-6812

Customer Number:

05073